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August 5, 2003

BY HAND

Marlene H. Dortch
Secretary
Federal Communications Commission
Office of the Secretary
c/o Vistrionix, Inc.
236 Massachusetts Avenue, NE
Suite 110
Washington, DC 20002

RECEIVED

AUG - 5 2003

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: CC Dkt. No. 94-129; Certification of Exemption from "Drop-Off" Requirement

Dear Ms. Dortch:

LCR Telecommunications, LLC ("LCR"), by its undersigned counsel, hereby certifies that it qualifies for an exemption from the "drop-off" requirement set forth in 47 C.F.R. Section 64.1120.

In its recent decision in CC Dkt. No. 94-129, the Commission established a new mechanism by which carriers' certifying as to their inability to comply with the "drop-off" rule will be exempt from that rule for a two-year period. See Implementation of the Subscriber Carrier Selection Changes Provisions of the Telecommunications Act of 1996; Policies and Rules Concerning Unauthorized Changes of Consumers' Long Distance Carriers, CC Docket No. 94-129, Third Order on Reconsideration and Second Notice of Proposed Rulemaking, 68 Fed. Reg. 19152 & 19176 (rel. March 17, 2003).

No. 124 as rec'd
12/1/03

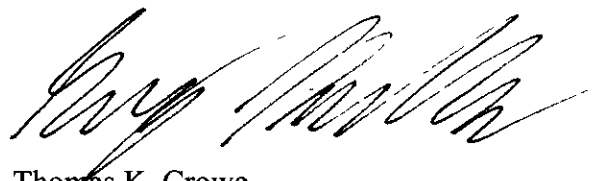
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Using LCR's phone system, once telemarketers initiate a three-way call with LCR's third party verification provider, they cannot "drop-off" the call without also disconnecting the potential customer from the verifier. Thus, LCR's telemarketing representatives are unable to "drop-off" of three way verification calls and are precluded from complying with the "drop-off" rule. Upgrading to a system that would allow LCR's telemarketers to "drop-off" once a three-way call is initiated would be prohibitively costly for a company of LCR's size. A certification signed by Martin J. Tibbitts, President of LCR, made in support of these statements under Section 1.16 of the Commission's rules is enclosed herewith.

Questions regarding this certification should be addressed to the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Greg Kunkle", written in a cursive style.

Thomas K. Crowe
Gregory E. Kunkle,
Counsel for LCR
Telecommunications, LLC

cc: Nancy Stevenson, Federal Communications Commission
Qualex International

Enclosure

CERTIFICATION

I, Martin J. Tibbitts certify that I am President of LCR Telecommunications, LLC ("LCR"); and that I am authorized to make this certification for LCR. Further, I certify that LCR is unable to comply with the "drop off" requirement as set forth in 47 C.F.R. Section 64.1120. Specifically, Using LCR's phone system, once telemarketers initiate a three-way call with LCR's third party verification provider, they cannot "drop-off" the call without also disconnecting the potential customer from the verifier. Upgrading to a system that would allow LCR's telemarketers to "drop-off" once a three-way call is initiated would be prohibitively costly for a company of LCR's size. I hereby certify that to the best of my knowledge and belief, under penalty of perjury, the foregoing statements are true and correct. Executed on 7-23-03.



Martin J. Tibbitts
President, LCR Telecommunications, LLC